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Summary of the Seattle Plant's Environmental Compliance Requirements

The Seattle facility presently has a need to be in compliance with a variety of Federal, State and Local environmental laws, as well as Longview Fibre Company directives. The following is a general description of the environmental compliance emphasis areas requiring the plant's on-going management efforts.

Wastewater

The plant generates and discharges all domestic sewage into the King County METRO wastewater sewage treatment system. All process wastewater from various production points in the box plant manufacturing area flow into an on-site Beckart Treatment Unit, and the treated water is reused for starch make-up. Since the installation of the Beckart Unit in 1998, there has been no process wastewater discharges into the METRO sewer system, since all process wastewater has been recycled in-plant. On November 17, 1997, King County Water and Land Resources Division, Industrial Waste Section, issued a draft Industrial Waste Discharge Permit to regulate the wastewater discharges from the Seattle plant. However, the final permit will not be issued until representative samples of wastewater can be collected and analyzed during actual discharges to the METRO sewer system. With the installation of the Beckart and the subsequent reuse of all wastewater, it is unknown when or if the final permit will be issued. Until such time, the draft permit is Not in force and will remain pending. If the plant finds that process wastewater discharge is necessary in the future, then METRO should be notified in order to continue with the permitting process.

Air Emissions

The plant generates air emissions from a variety of sources within the plant manufacturing areas, which include a natural gas-fired boiler, natural gas-fired space heaters, a trim-handling cyclone, starch baghouse, and VOC-containing materials. A new boiler was installed and tested for operational certification in March 1996.

A Title V emissions inventory and applicability analysis was performed by a contractor in 1995 to assess the plant's emissions generation posture with regard to the need for a PSAPCA air permit. The study found that all plant emissions were substantially less than the thresholds required for a permit. The Seattle Plant was determined to be a Minor Source, and is not required to submit an operating permit application to PSAPCA. As a minor source, the plant's only regulatory requirement is to pay an Annual Source Registration Fee to PSAPCA, which the plant has been doing. Documentation of PSAPCA's acknowledgement of the Seattle Plant's air emissions status is provided in Section 11 of this manual.

It should be understood, however, that any future modifications to either plant equipment, chemical, or fuel use patterns will need to be reviewed relative to PSAPCA's Notice of Construction process to determine whether a permission-to-construct permit is required. In addition, such modifications may also alter the facility's status as a Title V minor source, and will need to be evaluated accordingly.

Solid Wastes

The facility generates a variety of solid wastes that are required to be managed in certain legally-appropriate ways. No specific permits are required for the generation and disposal of the various solid waste sources at the plant, however, testing and approvals are necessary in order for

the contractors or county landfill to accept certain types of wastes. Presently, the plant generates sludges from the five flexo sumps, which are cleaned out twice per year by plant personnel, and removed from the plant by a contractor for disposal at the King County Landfill. Other solid wastes are collected in a dumpster and taken by Waste Management, Inc., to the county landfill, including corrugator sludges, trash, empty aerosol cans, and general garbage. Used oil is collected and sent to a licensed recycler (Safety Kleen). Empty ink buckets are reused in the ink kitchen. Paper trim and other corrugated wastes are recycled also. Empty 55-gallon metal drums from petroleum products are recycled by the vendor. Plastic and paper drums that cannot be recycled are emptied, cleaned and crushed for disposal in the trash. Finally, "bone yard" wastes,(scrap metals, old motors, belts, etc.) are sold to scrap dealers.

Hazardous Wastes

Presently, the plant does not generate hazardous waste. Samples are analyzed periodically of various sludges or other wastes to determine their waste classification to assure compliance with any hazardous waste rules. The solvents used in the plant parts washer unit are non-hazardous petroleum based (supplied by Safety Kleen).

Other Requirements

The plant has a 5,000 gallon diesel aboveground storage tank located outside near the NE end of the facility, which is used for backup fuel for the boiler. The existence of the diesel tank requires that the plant have a written Spill Prevention, Control and Countermeasures emergency plan (SPCC), which is on file at the facility (and also included in Section 12 of this manual). Other aboveground tanks of significance are a 4,000 gallon caustic tank, and a large starch silo, both located in the NE area of the plant.

There are no longer any underground tanks for fuels or chemicals on the plantsite. Some monitoring of a groundwater well in the vicinity of a former Diesel UST (removed in 1987) is still being conducted semi-annually by the plant. Data to date indicate little or no remaining residual diesel product in groundwater, and an effort is expected in the near-term to gain agency approval to close the well and cease sampling. Information concerning this UST issue is contained in Section 10 of this manual.

The plant has no asbestos materials or PCB-containing equipment anywhere at the site. Drinking water is supplied by the city water system.

Stormwater runoff is generated on the site during significant rainfall events, and the plant presently has been issued a Stormwater Permit (WDOE General Permit) by the Washington State Department of Ecology. The permit was issued December 18, 1995, and expires November 18, 2000. A requirement of the permit is for the plant to prepare and have on file a Stormwater Pollution Prevention Plan (SWPPP), which has been completed. According to the SWPPP the plant planned to implement several Best Management Practices (BMP's) to improve the stormwater management system. These BMP's have been completed. Documentation appears in Section 10 of this manual. Presently, no monitoring of stormwater discharges is required by the permit. Currently, the environmental compliance matters for the facility are handled by the Maintenance General Foreman, who is also designated the Environmental Coordinator, with some assistance from the Flexo Foreman. The Plant Manager is ultimately responsible for environmental compliance at the plant. The Corporate Environmental Section Supervisor, in Longview, is responsible for seeing that this manual is updated at least annually. The people in the Corporate Environmental Section are available to assist and advise the Seattle managers with environmental compliance issues or questions.